

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----  
MELINDA SERIN, JUDSON RUSS, LONG SOUI LIM,  
PERI KETTLER, GORDON REDNER, and THOMAS  
J. SMITH,

Plaintiffs,

-against-

NORTHERN LEASING SYSTEMS, INC., JAY  
COHEN, RICH HAHN, and SARA KRIEGER,

Defendant.  
-----

X

:

:

:

:

:

:

:

:

:

:

:

:

:

X

06 CV 1625 (SCR)

**APPENDIX OF EXCESSIVE TIME CHARGES**

**Key**

Red	Time spent by Mr. Chittur and Mr. Strutinskiy (54.9 hours) for litigation in New York City Civil Court
Yellow	Time spent by Mr. Strutinskiy (53.1 hours) for videotaping seven (7) depositions, while another attorney – Mr. Altman, was conducting those depositions
Grey	Time spent by Mr. Chittur (18.6 hours) for attending depositions that Mr. Altman was conducting, and which Mr. Strutinskiy was videotaping
Orange	Time spent by Mr. Strutinskiy (22.8 hours) for doing tasks such as copying or burning CD's or DVD's
Pink	Time spent by Mr. Strutinskiy (19.8 hours) for services that included acting as a messenger. Many of these time entries include other tasks as well, but are lumped together.
Light Blue	Time spent by Mr. Strutinskiy (13.8 hours) for services that are normally done by a secretary or paralegal, such as "arranging the file" or "filing", "making copies", scanning and emailing documents to co-counsel.
Green	Time spent by Mr. Altman (8 hours) for doing work typically done by an IT person, such as loading Defendant's document production into Concordance, and preparing images
Dark Blue	Time spent by Mr. Chittur (125 hours) for activities that included doing legal research, which is more appropriately performed by a more junior attorney
White	Unnecessary/excessive travel time (36 hours) spent by Mr. Altman

## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Andrey Strutinskiy						
Andrey Strutinskiy	11/5/2010	Attended and <i>video recorded</i> Lina Kravic deposition	\$350	6.20	Videographer	\$2,170.00
Andrey Strutinskiy	11/4/2010	Reviewed video depositions of Krieger and Cohen and <i>transferred it onto CDs</i>	\$350	1.60	Secretarial/IT work	\$560.00
Andrey Strutinskiy	11/3/2010	Reviewing deposition transcripts and videos; <i>Copied videos of depositions on a hard drive and arranging the file documents.</i>	\$350	4.00	Secretarial/IT work	\$1,400.00
Andrey Strutinskiy	11/2/2010	<i>Arranging the file and documents for JPTO</i>	\$350	1.60	Secretarial/Paralegal work	\$560.00
Andrey Strutinskiy	11/2/2010	<i>Prepared &amp; sent out the video deposition for sync to Todd Goldberg.</i>	\$350	2.20	Secretarial/IT work	\$770.00
Andrey Strutinskiy	10/28/2010	Attended and <i>videotaped</i> Cohen Deposition at Moses & Singer's office and tele conf w/Nigro and Altman	\$350	9.20	Videographer	\$3,220.00
Andrey Strutinskiy	10/27/2010	Reviewed Buono deposition video and <i>created Buono depo DVD</i>	\$350	1.20	Secretarial/IT work	\$420.00
Andrey Strutinskiy	10/27/2010	Reviewed deposition videos; <i>Created DVDs of Krieger 30 (b)(6) Deposition, and Hahn Deposition</i>	\$350	2.80	Secretarial/IT work	\$980.00
Andrey Strutinskiy	10/25/2010	Attended the Deposition of Richard Hahn, <i>videotaping</i>	\$350	7.30	Videographer	\$2,555.00
Andrey Strutinskiy	10/25/2010	Reviewed deposition video; <i>Burned Hahn Depo DVD</i>	\$350	1.20	Secretarial/IT work	\$420.00
Andrey Strutinskiy	10/25/2010	Prepared for deposition of Hahn, reviewed and prepared documents; <i>printed out docs and made copies of exhibits</i>	\$350	2.50	Secretarial/Paralegal work	\$875.00
Andrey Strutinskiy	10/19/2010	Reviewed and <i>copied the CDs w/docs received from Defendants</i>	\$350	0.70	Secretarial/IT work	\$245.00
Andrey Strutinskiy	10/19/2010	Prepared documents; drafted cover letter re doc production and <i>hand delivered the documents to Moses &amp; Singer</i>	\$350	0.70	Messenger	\$245.00
Andrey Strutinskiy	10/14/2010	Attended and <i>videotaped Sam Buono deposition</i>	\$350	6.60	Videographer	\$2,310.00
Andrey Strutinskiy	10/13/2010	Reviewed video of the deposition; <i>burned Sussman Depo on DVDs</i>	\$350	2.60	Secretarial/IT work	\$910.00
Andrey Strutinskiy	10/12/2010	Meeting with Altman; Prepared, attended and <i>videotaped Sussman depo</i>	\$350	10.90	Videographer	\$3,815.00
Andrey Strutinskiy	10/8/2010	Reviewed video deposition; <i>created DVD of Krebs deposition</i>	\$350	1.40	Secretarial/IT work	\$490.00
Andrey Strutinskiy	10/4/2010	<i>Scanned and e-mailed Exhibits from P's depositions to Altman; Scanned Russ depo transcript. Emailed all depo transcripts to Altman</i>	\$350	0.90	Secretarial/Paralegal work	\$315.00

## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Andrey Strutinskiy	9/28/2010	Prepared docs for production re Expert discovery, <i>bates numbered, scanned and hand delivered to Moses and Singer</i>	\$350	1.40	Messenger	\$490.00
Andrey Strutinskiy	9/20/2010	TC w/Jane from Hudson; attended and <i>videotaped continuation of 30(b)(6) deposition of ?</i>	\$350	4.50	Videographer	\$1,575.00
Andrey Strutinskiy	9/15/2010	<i>Hand delivered</i> Amended Rule 26 Disclosure	\$350	0.20	Messenger	\$70.00
Andrey Strutinskiy	8/30/2010	Finalized Responses to 2 <sup>nd</sup> Discovery request; Reviewed and prepared for production Russ Bank of America statements; Reviewed and prepared for production recorded files received from Serin on to the CD for Defendants; <i>hand delivered documents to Moses &amp; Singer</i>	\$350	6.00	Messenger	\$2,100.00
Andrey Strutinskiy	8/12/2010	<i>Organized the exhibits and documents after Krieger deposition ; reviewed depo video; created DVDs of the deposition</i>	\$350	1.30	Secretarial/IT work	\$455.00
Andrey Strutinskiy	8/12/2010	Custodian of records deposition of Sara Krieger. Prepared for deposition, prepared document and Exhibits; <i>videotaping of the deposition.</i>	\$350	8.40	Videographer	\$2,940.00
Andrey Strutinskiy	8/10/2010	Reviewed and <i>copied CD w/docs received from Defendants</i>	\$350	0.40	Secretarial/IT work	\$140.00
Andrey Strutinskiy	8/6/2010	<i>Copied disc and FedEx to Altman</i>	\$350	0.50	Secretarial/IT work	\$175.00
Andrey Strutinskiy	8/5/2010	<i>Copied disc and FedEx to Altman</i>	\$350	0.30	Secretarial/IT work	\$105.00
Andrey Strutinskiy	8/2/2010	<i>Prepared documents for co-counsel; Copying and zipping CD for sending it to Keith Altman</i>	\$350	1.70	Secretarial/IT work	\$595.00
Andrey Strutinskiy	7/26/2010	Reviewed and <i>copied CDs w/docs produced by Defendants NLS</i>	\$350	0.90	Secretarial/IT work	\$315.00
Andrey Strutinskiy	7/8/2010	<i>Emailed tel nos of plaintiffs to Stan Smith; Filing</i>	\$350	0.60	Secretarial/Paralegal work	\$210.00
Andrey Strutinskiy	7/7/2010	<i>Preparing documents for Stan Smith; scanning our document production and copying defendants docs</i>	\$350	1.60	Secretarial/Paralegal work	\$560.00
Andrey Strutinskiy	6/28/2010	Meeting with client Lim. Prepared the documents from clients for depo prep; <i>bates numbered the documents for production, made copies and hand delivered docs to Lillienstein</i>	\$350	1.40	Messenger	\$490.00
Andrey Strutinskiy	6/24/2010	<i>Reviewed numbered and copied additional documents produced by Plaintiffs and hand delivered it to Moses and Singer</i>	\$350	1.20	Messenger	\$420.00

## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Andrey Strutinskiy	6/11/2010	Finalized and <i>delivered interrogatories to Moses and Singer</i>	\$350	1.40	Messenger	\$490.00
Andrey Strutinskiy	6/9/2010	Finalized and <i>served subpoena upon Sussman</i>	\$350	2.00	Messenger	\$700.00
Andrey Strutinskiy	5/27/2010	<i>Entered expenses and filed documents</i>	\$350	0.20	Secretarial/Paralegal work	\$70.00
Andrey Strutinskiy	5/26/2010	Reviewed and <i>bates numbered documents received from Russ and delivered it to Moses and Singer's office</i>	\$350	0.70	Messenger	\$245.00
Andrey Strutinskiy	4/30/2010	Reviewing and arranging documents for production; <i>making copies, numbering documents</i>	\$350	2.60	Secretarial/Paralegal work	\$910.00
Andrey Strutinskiy	4/30/2010	Prepared and reviewed documents for production; <i>hand delivered documents to Moses &amp; Singer</i>	\$350	0.60	Messenger	\$210.00
Andrey Strutinskiy	3/20/2007	E-mail to Sussman re Smith Discovery dispute	\$350	0.40	Civil Court Case	\$140.00
Andrey Strutinskiy	1/2/2007	Finalizing discovery requests and answer in NLS v. Simith, mailed it to Sussman	\$350	3.20	Civil Court Case	\$1,120.00
Andrey Strutinskiy	12/27/2006	Drafting e-mails to Sussman; e-mailed Sussman re Simth case	\$350	0.40	Civil Court Case	\$140.00
Andrey Strutinskiy	12/15/2006	Checking the civil court judgments re Lim and Russ	\$350	0.40	Civil Court Case	\$140.00
Andrey Strutinskiy	12/15/2006	Checked the files re Lim and Russ City Civ Court judgments; Drafted, finalized and faxed letter	\$350	1.10	Civil Court Case	\$385.00
Andrey Strutinskiy	12/5/2006	Reviewing Jaffe's orders in Simth and Russ	\$350	0.50	Civil Court Case	\$175.00
Andrey Strutinskiy	12/1/2006	Finalizing letter to Joseph Sussman	\$350	0.60	Civil Court Case	\$210.00
Andrey Strutinskiy	11/8/2006	Meeting w/Russ and court appearance	\$350	7.50	Civil Court Case	\$2,625.00
Andrey Strutinskiy	11/7/2006	Reviewing motion papers in Russ & Smith	\$350	2.70	Civil Court Case	\$945.00
Andrey Strutinskiy	11/2/2006	Drafting reply to motion for reargument in Smith	\$350	3.60	Civil Court Case	\$1,260.00
Andrey Strutinskiy	10/31/2006	Drafting reply to motion to renew and reargue--Smith; drafting answer and counterclaim, notice of deposition in Ketler	\$350	3.00	Civil Court Case	\$1,050.00
Andrey Strutinskiy	10/23/2006	Conf w/KC re Deposition and civ ct cases Smith and Russ; TC w/filed notice of appeal and motion to renew and reargue in NLS v Smith	\$350	5.60	Civil Court Case	\$1,960.00
Andrey Strutinskiy	10/19/2006	Reviewed civ ct files and re affidavit of Taryl Dall from the Tomas Simth file; drafted and finalized notice of appeal in Pludeman; Conf w/KC re motion for renew and reargue	\$350	5.20	Civil Court Case	\$1,820.00

## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Andrey Strutinskiy	10/13/2006	TC w/Valerie Smith she wil finalize the affidavit by tomorrow and we should get it by Monday; working on Smith's motion to reargue and renew; checked the files for Taryl Dall's affidavit re NLS v Smith case	\$350	4.10	Civil Court Case	\$1,435.00
Andrey Strutinskiy	10/10/2006	Drafting motion for reargument and reconsideration in NLS v. Smith	\$350	2.70	Civil Court Case	\$945.00
Andrey Strutinskiy	10/6/2006	Finalized and submitted Reply re Russ' motion for stay to the App Term by hand delivery	\$350	3.20	Civil Court Case/Messenger	\$1,120.00
Andrey Strutinskiy	10/5/2006	Conf w/KC re Hearing in Russ and Smith; attending the hearing in Smith and Russ before Jaffee in City Civ Ct	\$350	5.20	Civil Court Case	\$1,820.00
Andrey Strutinskiy	10/4/2006	Finalizing reply affirmation re motion to stay proceedings pending appeal in NLS v Russ	\$350	2.00	Civil Court Case	\$700.00
Andrey Strutinskiy	10/2/2006	Scanned and e-mailed Valerie Smith's letter to KC	\$350	0.40	Civil Court Case	\$140.00
Andrey Strutinskiy	9/25/2006	Conf w/KC re Russ case; Finalizing Russ' motion to the Appellate term	\$350	6.00	Civil Court Case	\$2,100.00
Andrey Strutinskiy	9/22/2006	Finalizing Russ' motion for stay	\$350	3.50	Civil Court Case	\$1,225.00
Andrey Strutinskiy	9/15/2006	TC w/Russ	\$350	0.30	Civil Court Case	\$105.00
Andrey Strutinskiy	9/14/2006	Scanned and e-mailed decisions on the motion to Smith and Russ	\$350	0.30	Civil Court Case	\$105.00
Andrey Strutinskiy	9/11/2006	Reviewing Jaffe's decision re NLS v. Russ; conf w/KC re Smith and Russ cases' TC w/Russ re his affidavit he mailed it by regular mail	\$350	1.70	Civil Court Case	\$595.00
Andrey Strutinskiy	9/6/2006	Finalizing Russ affidavit re Rapid Cash; Reviewing Jaffe's Decision re Thomas Smith; Consultation w/KC; e-mailed affidavit re default judgment to Russ; reviewing Kettler's e-mail re Krieger affidavit	\$350	2.50	Civil Court Case	\$875.00
Andrey Strutinskiy	8/25/2006	Drafted and finalizing opposition papers re motion to dismiss; filing memo of law and affirmation via ECF; <i>prepared courtesy copies of motion papers for court</i>	\$350	3.80	Secretarial/Paralegal work	\$1,330.00
Andrey Strutinskiy	8/17/2006	Reviewed Smith and Russ documents and files; Smith-finalized and <i>hand delivered letter to Jaffee with additional affidavits ; faxed copy to Sussman</i> ; TC w/Sussman re document sent to judge; Tele-Conference <i>w/Judge Jaffe</i> re Smith and Russ cases	\$350	4.20	Messenger & Secretary work; who is Judge Jaffe?; Civit Court Case	\$1,470.00
Andrey Strutinskiy	8/7/2006	called Valerie Smith, drafted aff re his signature; Scanning and emailing Krieger affidavit to Kettler, left message to Kettler;	\$350	1.50	Civil Court Case	\$525.00

## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Andrey Strutinskiy	8/4/2006	Appeared in court for Russ & Smith motions; consultation w/KC; Scanning and E-mailing Krieger's affidavit re motion to dismiss	\$350	4.00	Civil Court Case	\$1,400.00
Andrey Strutinskiy	8/3/2006	Preparing for court appearance in Russ and Smith cases	\$350	2.80	Civil Court Case	\$980.00
Andrey Strutinskiy	7/25/2006	Received notice of Cross motion in Russ; Reviewing Notice of Cross Motion in NLS v. Russ; TC w/Sussman re returnable date of the motion	\$350	3.10	Civil Court Case	\$1,085.00
Andrey Strutinskiy	7/25/2006	Reviewed NLS Opp due in Russ- received by mail on July 25, 2006	\$350	1.20	Civil Court Case	\$420.00
Andrey Strutinskiy	7/5/2006	TC w/Sussman re adjournment of the Kettler, Kabage and Russ motions; reviewing and sending signe stipulations back to Sussman; TC w/clients	\$350	1.20	Civil Court Case	\$420.00
Andrey Strutinskiy	6/20/2006	Civ Court Appearance in NLS v Smith, return date was adjourned to July 12, 2006	\$350	2.20	Civil Court Case	\$770.00
Andrey Strutinskiy	6/19/2006	Finalizing attorney affirmation in Smith's case; e-mailing Sussman re Rapid Cash; TC w/Valery Smith re affidavit she sent; preparing for the oral argument on Smith case in Civil court	\$350	3.20	Civil Court Case	\$1,120.00
Andrey Strutinskiy	6/16/2006	Finalizing affirmation in Smith's case	\$350	0.60	Civil Court Case	\$210.00
Andrey Strutinskiy	6/15/2006	Reviewing e-mail from Rus; e-mail to Sussman re NLS v. Rapid Cash civ court litigation	\$350	0.60	Civil Court Case	\$210.00
Andrey Strutinskiy	6/6/2006	Finalizing Smith's reply to cross-motion; reviewing Ketter's e-mail; TC w/Dean he does not recognize Ketter's name, hung up the phone; L/M for Kettler;	\$350	3.10	Civil Court Case	\$1,085.00
Andrey Strutinskiy	6/5/2006	Finalizing Smith's reply papers	\$350	4.60	Civil Court Case	\$1,610.00
Andrey Strutinskiy	6/1/2006	E-mail to Sussman re Kettler; e-mail to Sussman re Russ	\$350	0.60	Civil Court Case	\$210.00
Andrey Strutinskiy	5/26/2006	Drafting and sending an e-mail to Sussman; drafting opposition in Smith motion to dismiss	\$350	2.70	Civil Court Case	\$945.00
Andrey Strutinskiy	5/25/2006	Filing motions in Civ CT re Russ, McAndrews, Kabage; Drafting Smith Affidavit, TC w/Alla re document review tomorrow l/m for Sussman	\$350	3.90	Civil Court Case	\$1,365.00
Andrey Strutinskiy	5/23/2006	Finalizing Russ motion; preparing affidavits of service	\$350	1.60	Civil Court Case	\$560.00
Andrey Strutinskiy	5/22/2006	Drafting and finalizing Russ motion	\$350	1.90	Civil Court Case	\$665.00

## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Andrey Strutinskiy	5/19/2006	Finalizing civ ct motion Russ	\$350	5.20	Civil Court Case	\$1,820.00
Andrey Strutinskiy	5/16/2006	Appearance in civil court-adjourning Smith's motion	\$350	3.40	Civil Court Case	\$1,190.00
Andrey Strutinskiy	5/11/2006	Russ-Court appearance for oral argument on motion to dismiss. Reviewed and scanned NLS Reply to Smith motion to dismiss	\$350	4.40	Civil Court Case	\$1,540.00
Andrey Strutinskiy	5/10/2006	Russ Civ Ct-drafting memo in reply; TC w/Sussman re briefing schedule	\$350	4.40	Civil Court Case	\$1,540.00
Andrey Strutinskiy	4/25/2006	Reviewing the decision in Lim; Drafted and served Notice of Entry; TC with Sussman Re Adjournment of Smith Motion from May 2nd Return on 5/15/06 his opp due on 5/9 or reply on 5/5	\$350	2.00	Civil Court Case	\$700.00
Andrey Strutinskiy	4/24/2006	Reviewing Russ' responses to X-Motion	\$350	0.80	Civil Court Case	\$280.00
Andrey Strutinskiy	4/18/2006	Court appearance for Russ motion; drafting and sending letter to Kettler	\$350	1.70	Civil Court Case	\$595.00
Andrey Strutinskiy	4/17/2006	E-mail to Russ; Reviewed and Scanned opposition papers; reviewing cases and deadlines in Civ Court Litigation	\$350	1.70	Civil Court Case	\$595.00
Andrey Strutinskiy	4/14/2006	File M-n to Dismiss in Civil Court-Smith	\$350	1.20	Civil Court Case	\$420.00
Andrey Strutinskiy	4/12/2006	E-mail to Sussman re Thomas Smith offer	\$350	0.20	Civil Court Case	\$70.00
Andrey Strutinskiy	4/6/2006	Russ-Filing Motion to consolidate and to dismiss, requested Russ' files for review in civ court, but clerk could not locate them	\$350	4.00	Civil Court Case	\$1,400.00
Andrey Strutinskiy	3/30/2006	TC w/Alla from Sussman's office re our request for extension to file response in civ ct on Russ, Kettler, Smith; drafting motions in Smith and kettler; l/m for Kettler; Consultation with KC	\$350	2.20	Civil Court Case	\$770.00
Andrey Strutinskiy	3/30/2006	Finalizing Smith motion to dismiss; served it on Sussman	\$350	2.20	Civil Court Case	\$770.00
Andrey Strutinskiy	3/29/2006	Drafting motion to dismiss re Thomas Smith	\$350	3.40	Civil Court Case	\$1,190.00
Andrey Strutinskiy	3/9/2006	Appearance in civil court for oral argument on Lim's motion to dismiss	\$350	3.20	Civil Court Case	\$1,120.00
Andrey Strutinskiy	3/8/2006	Finalizing Lim's Motion and preparing for the oral argument on the motion to dismiss	\$350	0.60	Civil Court Case	\$210.00
Andrey Strutinskiy	3/2/2006	Drafting and finalizing reply re Lim's motion to dismiss; drafting response letter to Sussman re his offer of settlement to Lim	\$350	2.10	Civil Court Case	\$735.00
Andrey Strutinskiy	3/1/2006	Drafting Reply in re Lim's motion to dismiss	\$350	1.90	Civil Court Case	\$665.00



## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Andrey Strutinskiy	2/3/2006	Finalizing the motion to dismiss in Lim case	\$350	2.60	Civil Court Case	\$910.00
Andrey Strutinskiy	12/5/2005	Filing Answer in Civ Ct in Lim's Case	\$350	1.50	Civil Court Case	\$525.00
Andrey Strutinskiy	12/1/2005	Drafting motion to dismiss for forum non conv-LIM	\$350	4.00	Civil Court Case	\$1,400.00
Andrey Strutinskiy	11/30/2005	LIM-Drafting motion to dismiss for forum non convenience; Replying to Russ's e-mail	\$350	0.80	Civil Court Case	\$280.00
Andrey Strutinskiy	11/30/2005	LIM-Drafting motion to dismiss for forum non convenience	\$350	0.30	Civil Court Case	\$105.00
Andrey Strutinskiy	7/20/2005	Court appearance in City Civ Ct for a motion	\$350	2.20	Civil Court Case	\$770.00
Andrey Strutinskiy	7/20/2005	Court appearance in City Civ Ct for Lim and Dougish motions	\$350	2.10	Civil Court Case	\$735.00
Andrey Strutinskiy	7/13/2005	Reviewing responses from Lim to Krieger's affidavit; drafting affidavit; consultation w/KC	\$350	1.70	Civil Court Case	\$595.00
Andrey Strutinskiy	7/13/2005	Reviewing Lim's responses to Krieger affidavit, making notes for client's affidavit	\$350	1.10	Civil Court Case	\$385.00
Andrey Strutinskiy	6/10/2005	Finalizing and filing OSC to Vacate the Judgment in Lim's case (civ ct)	\$350	2.20	Civil Court Case	\$770.00
Andrey Strutinskiy	6/9/2005	Finalizing OSC in Lim's case (re judgment)	\$350	1.80	Civil Court Case	\$630.00
Andrey Strutinskiy	6/9/2005	Reviewed files in Civil Court to get information about the cases in which we represent defendants; Finalizing OSC in Lim's case (re judgment)	\$350	4.70	Civil Court Case	\$1,645.00
Andrey Strutinskiy	5/12/2005	Finalizing OSC to vacate the judgment in Lim's case	\$350	2.40	Civil Court Case	\$840.00
Andrey Strutinskiy	5/12/2005	Drafting OSC to vacate the judgment in Lim's case	\$350	2.00	Civil Court Case	\$700.00
Andrey Strutinskiy	4/29/2005	Drafting OSC re Lim drafting client affidavit re judgment	\$350	1.00	Civil Court Case	\$350.00
Andrey Strutinskiy	4/29/2005	Correcting Lim's affidavit re judgment and e-mailing it to him.	\$350	1.00	Civil Court Case	\$350.00
Andrey Strutinskiy	4/28/2005	Drafting discovery request; Finalizing OSC to vacate the judgment in civil court against Lim	\$350	1.40	Civil Court Case	\$490.00
Andrey Strutinskiy	4/28/2005	Finalizing OSC to vacate the judgment in civil court against Lim	\$350	1.40	Civil Court Case	\$490.00
Andrey Strutinskiy	1/24/2005	Reviewed and replied to J. Russ' e-mail	\$350	0.20	Civil Court Case	\$70.00
Andrey Strutinskiy	9/20/2004	TeleConv w/Judson Russ re affidavit and missing last page from his original affidavit	\$350	0.20	Civil Court Case	\$70.00
Andrey Strutinskiy	9/14/2004	Finalizing Judson Russ Affidavit in City Civ Ct litigation	\$350	1.90	Civil Court Case	\$665.00
Andrey Strutinskiy	9/14/2004	Finalizing Judson Russ Affidavit in City Civ Ct litigation	\$350	0.20	Civil Court Case	\$70.00
		<b>TOTALS for Andrey Strutinskiy</b>		<b>251.20</b>		\$0.00
						\$0.00
Keith Altman						\$0.00



## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Keith Altman	7/6/2010	Initial review of Defendants' first email production. <i>Loading into Concordance and preparation of images.</i>	\$425	4.00	IT work	\$1,700.00
Keith Altman	7/16/2010	Receipt of hard drive containing approximately 770,000 pages of documents. Initial survey of data. <i>Preparation of images into multi-page format. Loading data and documents into concordance and inspecting integrity of data.</i> Correspondence with Co-Coun	\$425	4.00	IT work	\$1,700.00
Keith Altman	8/12/2010	Deposition of Sara Krieger-30(b)(6)-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	9/20/2010	Deposition of Ken Krebs-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	10/5/2010	Meetings with co-counsel-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	10/12/2010	Deposition of Joseph Sussman-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	10/14/2010	Deposition of Sam Buono-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	10/25/2010	Deposition of Richard Hahn-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	10/26/2010	Deposition of Ricky Brown-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	10/27/2010	Deposition of Sara Krieger-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	10/28/2010	Deposition of Jay Cohen-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	11/4/2010	Deposition of Jay Cohen-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	11/5/2010	Deposition of Lina Kravic-Travel Time	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
Keith Altman	11/15/2010	Travel time round trip to court	\$213	3.00	Unnecessary/Excessive Travel	\$637.50
		<b>TOTALS for Keith Altman</b>		<b>44.00</b>		\$0.00
						\$0.00
<b>Krishnan Chittur</b>						\$0.00
Krishnan Chittur	1/2/2007	Smith-review, finalize answer and discovery requests	\$600	2.10	Civil Court Case	\$1,260.00
Krishnan Chittur	10/4/2006	Finalize Russ reply	\$600	5.00	Civil Court Case	\$3,000.00
Krishnan Chittur	10/3/2006	TC Varnell, review Russ papers re motion for stay	\$600	2.30	Civil Court Case	\$1,380.00
Krishnan Chittur	9/26/2006	TC Cozier re Russ motion	\$600	0.30	Civil Court Case	\$180.00
Krishnan Chittur	9/25/2006	Mtg. Andrey re Russ	\$600	3.10	Civil Court Case	\$1,860.00
Krishnan Chittur	9/11/2001	Review Russ decision, conf AS	\$600	0.50	Civil Court Case	\$300.00
Krishnan Chittur	8/4/2008	Meeting AS re Russ and Smith cases	\$600	1.20	Civil Court Case	\$720.00

## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Krishnan Chittur	5/23/2006	Finalize Russ affirmation	\$600	1.30	Civil Court Case	\$780.00
Krishnan Chittur	5/17/2007	Review/finalize Russ papers	\$600	4.40	Civil Court Case	\$2,640.00
Krishnan Chittur	5/11/2006	TC AS re Russ Motion; conf AS re McAndrews, Kabage	\$600	1.00	Civil Court Case	\$600.00
Krishnan Chittur	3/30/2006	Conf AS re civil court cases, email smith aff	\$600	3.40	Civil Court Case	\$2,040.00
Krishnan Chittur	3/28/2006	Review, revise Andrey email to Sussman, mtg Andre re new case, review Smith case	\$600	2.60	Civil Court Case	\$1,560.00
Krishnan Chittur	3/8/2006	Review Lim papers, TC Jane	\$600	2.90	Civil Court Case	\$1,740.00
Krishnan Chittur	2/3/2006	Draft Lim motion	\$600	2.20	Civil Court Case	\$1,320.00
Krishnan Chittur	2/2/2006	Finalize Lim motion	\$600	1.50	Civil Court Case	\$900.00
Krishnan Chittur	12/2/2005	Respond to email, finalize Lim motion	\$600	2.20	Civil Court Case	\$1,320.00
Krishnan Chittur	7/8/2005	Email Kaufman, review answering papers in Dougish, Lim	\$600	1.20	Civil Court Case	\$720.00
Krishnan Chittur	6/20/2005	conference with AS re Lim	\$600	1.00	Civil Court Case	\$600.00
Krishnan Chittur	6/9/2005	draft OSC re Lim	\$600	6.90	Civil Court Case	\$4,140.00
Krishnan Chittur	4/20/2005	TC LAS, review affidavit of Lim, research re 5015 and OSC re transfer, TC Certo	\$600	5.40	Civil Court Case	\$3,240.00
Krishnan Chittur	8/24/2004	Research, TC Russ	\$600	2.80	Civil Court Case	\$1,680.00
Krishnan Chittur	8/17/2004	TC Judson Russ	\$600	0.20	Civil Court Case	\$120.00
Krishnan Chittur	8/11/2004	TC Valerie Smith	\$600	0.40	Civil Court Case	\$240.00
Krishnan Chittur	8/6/2004	Email to client Smith	\$600	0.40	Civil Court Case	\$240.00
Krishnan Chittur	7/27/2004	Email to Kaufman, review fax from client Smith	\$600	0.60	Civil Court Case	\$360.00
Krishnan Chittur	12/29/2010	Draft aff re fees, research, revise fee brief	\$600	8.10	Legal Research	\$4,860.00
Krishnan Chittur	12/28/2010	Research and draft fee app	\$600	3.90	Legal Research	\$2,340.00
Krishnan Chittur	12/27/2010	Research, draft fee application	\$600	9.30	Legal Research	\$5,580.00
Krishnan Chittur	12/26/2010	Research, draft fee brief	\$600	1.20	Legal Research	\$720.00
Krishnan Chittur	12/24/2010	Research re fee standards	\$600	5.10	Legal Research	\$3,060.00
Krishnan Chittur	11/30/2010	Review time sheets, research re attorney time sheets, email Defense counsel	\$600	0.80	Legal Research	\$480.00
Krishnan Chittur	11/18/2010	Research, draft fee application	\$600	0.80	Legal Research	\$480.00

## Appendix

ATTORNEY	DATE	DESCRIPTION	HOURLY RATE	TIME (HRS)	NOTES	HR. RATE X TIME
Krishnan Chittur	11/15/2010	Research re attorneys' fees in NY	\$600	1.80	Legal Research	\$1,080.00
Krishnan Chittur	11/6/2010	Research, prepare JPTO	\$600	9.10	Legal Research	\$5,460.00
Krishnan Chittur	10/29/2010	Review documents, research	\$600	9.30	Legal Research	\$5,580.00
Krishnan Chittur	10/24/2010	Review docs on CD, research	\$600	7.30	Legal Research	\$4,380.00
Krishnan Chittur	10/14/2010	Atd deposition of Sam Buono, review doc	\$600	3.00	Unnecessary Attendance at Deposition	\$1,800.00
Krishnan Chittur	10/12/2010	Atd deposition of Sussman, review Judge order, email clients	\$600	3.60	Unnecessary Attendance at Deposition	\$2,160.00
Krishnan Chittur	9/20/2010	Mtg Altman, prepare for and atd deposition of Krebs, mtg Altman and Andrey	\$600	3.90	Unnecessary Attendance at Deposition	\$2,340.00
Krishnan Chittur	8/12/2010	Deposition of custodian of records Sara Krieger	\$600	8.10	Unnecessary Attendance at Deposition	\$4,860.00
Krishnan Chittur	8/24/2006	Lesser email re appeal; serin-review, revise brief, research	\$600	7.30	Legal Research	\$4,380.00
Krishnan Chittur	8/21/2006	Research, draft brief	\$600	8.20	Legal Research	\$4,920.00
Krishnan Chittur	8/18/2006	Serin-research draft brief	\$600	8.50	Legal Research	\$5,100.00
Krishnan Chittur	8/17/2006	Serin-research draft brief	\$600	5.80	Legal Research	\$3,480.00
Krishnan Chittur	8/15/2006	Serin-research draft response	\$600	2.60	Legal Research	\$1,560.00
Krishnan Chittur	8/11/2006	Research re Serin brief	\$600	5.20	Legal Research	\$3,120.00
Krishnan Chittur	8/10/2006	Review, research, draft Serin response	\$600	5.30	Legal Research	\$3,180.00
Krishnan Chittur	8/8/2006	Review appellate division brief, research re Serin case, draft brief	\$600	4.60	Legal Research	\$2,760.00
Krishnan Chittur	8/7/2006	Review Serin brief, research, drafting	\$600	2.70	Legal Research	\$1,620.00
Krishnan Chittur	5/10/2006	Email Russ, research, draft Russ Reply	\$600	7.90	Legal Research	\$4,740.00
Krishnan Chittur	5/9/2006	Review russ affidavit, legal research, draft and finalize KC affidavit	\$600	3.10	Legal Research	\$1,860.00
Krishnan Chittur	2/19/2006	Research re RICO, draft complaint	\$600	7.10	Legal Research	\$4,260.00
		<b>TOTALS for Krishnan Chittur</b>		<b>198.50</b>		
		<b>TOTALS for Andrey Strutinsky, Keith Altman, and Krishnan Chittur</b>		<b>493.70</b>		